

Case 4:24-cv-00545-LMC Document 1-2 Filed 08/21/24 Page 1 of 26

PARTIES

4. Plaintiff is now, and was at all times relevant to the allegations in this petition, a female resident and citizen of the State of Missouri.

5. Defendant is a For-Profit Corporation with its principal place of business in the state of California.

6. At all times relevant to the allegations in this petition are employees of Defendant HGE referenced in this Petition acted directly in the interests of Defendant HGE.

JURISDICTION AND VENUE

7. Plaintiff's first injury occurred in Jackson County, Missouri making this Court an appropriate forum.

FACTUAL ALLEGATIONS

8. At all times relevant to the allegations in this petition, Plaintiff was an employee of Defendant HGE.

9. During her employment, Plaintiff was subjected to unwelcome and offensive conduct by co-workers.

10. Plaintiff is an African American female.

11. Plaintiff was initially hired by HGE on October 12, 2021, as the Regional Director over the Northeast Region.

12. Plaintiff worked principally from her home in Kansas City, Missouri.

13. Plaintiff's region included 21 schools: New York (4), New Jersey (9), Maryland (5), Massachusetts (2), and Pennsylvania (1).

14. On or around July 15, 2022, Plaintiff was assigned Museum Mile, a failing school that was losing HGE approximately 100k per month.

15. Plaintiff was instructed to hire a new leader for the school.

16. [REDACTED], her supervisor, forced Plaintiff to interview an unqualified White man [REDACTED] to lead the school despite having a more qualified Black female candidate [REDACTED]

17. [REDACTED] was a 24-year-old who dropped out of college in his sophomore year.

18. He had no experience in education and a school leadership role would be his first job out of college.

19. [REDACTED] was in her late 40s with a Master's degree in Education, two Montessori certifications, and over 20 years of experience in education.

20. Plaintiff complained to [REDACTED] that she believed a qualified Black candidate was being passed over for an unqualified White applicant.

21. Ultimately, [REDACTED] believed [REDACTED] was "scrappy."

22. Consequently, [REDACTED] was hired as Head of School, at 110k with an 80k bonus potential, and [REDACTED] was hired as Assistant Head of School at 90k with a 15k bonus potential.

23. On or around September 8, 2022, Plaintiff was up for a promotion that her

previous manager, [REDACTED], put in place.

24. [REDACTED], Plaintiff's Supervisor and VP of School Success, said she could not promote Plaintiff to Senior RD because her performance reviews for the region were not completed on time.

25. Notably, other Regional Directors did not have their performance reviews completed on time.

26. However, they were not penalized.

27. Importantly, [REDACTED] had not completed her performance reviews for Regional Directors.

28. Several days later, on September 13, 2022, [REDACTED] blamed Plaintiff for the poor performance of Museum Mile, among other things, in spite of the fact that an unqualified White man, [REDACTED], was the School Director.

29. On September 14, 2022, Plaintiff complained to [REDACTED], the Company's COO, stating that Plaintiff believed [REDACTED] treatment of Plaintiff was racially motivated.

30. [REDACTED] indicated she would look into Plaintiff's complaints.

31. Plaintiff never received any response.

32. Following her complaints, on September 16, 2022, [REDACTED] and [REDACTED] were each promoted to Senior Regional Director.

33. On November 2, 2022, Plaintiff met with [REDACTED] (Director of Special Projects – reporting to [REDACTED]) to discuss race dynamics, salary, and the

disparate treatment she received from [REDACTED].

34. [REDACTED] advised Plaintiff to study HGE's method to written communication and shift her approach accordingly for 60 days.

35. If Plaintiff saw a positive shift in communication from [REDACTED] and other members of senior leadership, then her communication style is the cause.

36. However, if Plaintiff saw no change or a negative shift, then Plaintiff would have her answer.

37. In response, Plaintiff reached out to [REDACTED], manager of School Success, and asked her to coach Plaintiff and pre-read her emails— which she did.

38. Despite Plaintiff's efforts, the harassment got worse.

39. For example, throughout the remainder of 2022, Plaintiff was not allowed to staff her campuses, despite very clear evidence that the campuses were understaffed.

40. Plaintiff's emails went ignored.

41. Plaintiff's requests were denied.

42. Plaintiff was intentionally left off emails so Plaintiff could not respond.

43. This did not happen at campuses where the regional manager/director was White.

44. The "hiring freeze" from Plaintiff's region did not end until Plaintiff sent an email to alert the company and tagged every senior leader from every department.

45. On January 19, 2023, Plaintiff applied to take Montessori professional development courses through the Company's Prepared Montessorian Institute and was

denied by [REDACTED], without a reason.

46. [REDACTED] approved [REDACTED], a White woman, to take the courses.

47. On January 26, 2023, Plaintiff met with [REDACTED] for their regularly scheduled 1:1 meeting.

48. [REDACTED] informed Plaintiff that layoffs would occur in every department.

49. However, later that day, Plaintiff received notice that HGE hired a new Regional Manager to take over a smaller region.

50. Plaintiff sent [REDACTED] a Teams chat asking about the contradiction and received the following response: "I know it appears counterintuitive, however, the restructuring is focused on creating localized regional teams to support expansion into more (smaller) regions than we have now."

51. On January 31, 2023, Plaintiff emailed [REDACTED] that her treatment by [REDACTED], and others, was racially motivated.

52. Plaintiff further indicated that she was not being treated the same as her White co-workers with respect to salary, support and performance objectives/critiques.

53. The following day, on February 1, 2023, Plaintiff was terminated.

54. Notably, the Company posted an opening for a Regional Manager in Kansas City, MO.

55. [REDACTED], a White woman who was also laid off from a different department, was offered the job.

56. [REDACTED] resides in Minnesota.

57. At all relevant times to the allegations in this Petition, Defendant's employees were agents, servants and/or employees of Defendant; and/or were at all such times directly acting in the interests of Defendant; and/or were acting within the scope and course of their agency and employment; and/or acted as proxies/alter egos of Defendant. Therefore, Defendant is liable for their actions under all theories pled therein.

58. The conduct as set forth herein constitutes a continuing violation of the Missouri Human Rights Act.

CONDITION PRECEDENT

59. On June 19, 2023, Plaintiff filed a timely Charge of Discrimination with the Missouri Commission on Human Rights. *A copy of the charge is attached hereto as Exhibit A and is incorporated herein by reference.*

60. On April 23, 2024, Plaintiff received her right-to-sue notice pursuant to the Missouri Human Rights Act. *A copy of the right to sue is attached hereto as Exhibit B and incorporated herein by reference.*

61. This action has been timely filed with this Court, and Plaintiff has met all conditions precedent to filing this action.

COUNT I MHRA-Racial Discrimination and Harassment

62. Plaintiff incorporates by reference the allegations in the preceding paragraphs as if set forth herein.

63. The conduct and actions of the above-described perpetrators as set forth herein constituted unwelcome conduct based upon race.

64. Plaintiff was discriminated against upon the basis of her race.

65. The actions and conduct of the above-described perpetrators as set forth herein created an abusive, hostile, offensive and intimidating work environment.

66. Plaintiff's terms, conditions, and privileges of employment were adversely altered because Defendant's employees and management classified Plaintiff on the basis of her race in such manner that she was treated differently than her similarly situated co-workers.

67. Plaintiff's status as an employee was adversely affected because of the discriminatory treatment she received from Defendant's management.

68. The conduct as described herein would have detrimentally affected a reasonable person of the same race in Plaintiff's position.

69. Defendant's actions against Plaintiff have caused her pain, anguish, anxiety and distress.

70. The actions and conduct set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Plaintiff, and therefore Plaintiff is entitled to punitive damages from Defendant, to punish Defendant and to deter Defendant and others from like conduct, pursuant to RSMo Chapters 213, 285 and 287.

WHEREFORE, Plaintiff prays for judgment against Defendant on Count I of her

Petition, for a finding that he has been subjected to unlawful discrimination prohibited by Mo.Rev.Stat. §213.010 *et seq.*; for an award of compensatory and punitive damages; for his costs expended; for his reasonable attorneys' fees; and for other and further relief the Court deems just and proper.

COUNT II
MHRA-Discrimination in Violation of Mo. Rev. Stat. §213.055
Sexual Discrimination

71. Plaintiff incorporates by reference the allegations in the preceding paragraphs as if set forth herein.

72. Plaintiff was discriminated against upon the basis of her sex.

73. Plaintiff's terms, conditions, and privileges of employment were adversely altered because Defendant's employees and management classified Plaintiff on the basis of her sex in such manner as to treat her differently than her similarly situated male co-workers.

74. Plaintiff's status as an employee was adversely affected because of the discriminatory treatment she received from Defendant's employees and management.

75. Defendant's conduct has caused Plaintiff degradation, pain, anguish, anxiety and distress.

76. The conduct described herein would have detrimentally affected a reasonable person of the same sex in Plaintiff's position.

77. The actions and conduct set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Plaintiff, and

therefore Plaintiff is entitled to punitive damages from Defendant, to punish Defendant and to deter Defendant and others from like conduct.

WHEREFORE, Plaintiff prays for joint and several judgment against Defendant on Count II of her petition, for a finding that she has been subjected to unlawful conduct prohibited by Mo. Rev. Stat § 213.010 *et seq*; for an award of compensatory and punitive damages; for her costs expended; for her reasonable attorneys fees; and for other and further relief the Court deems just and proper.

COUNT III
MHRA-Retaliation relating to Mo.Rev.Stat §213.070

78. Plaintiff incorporates by reference the allegations in the preceding paragraphs as if set forth herein.

79. Plaintiff engaged in protected activity in complaining to her manager regarding the treatment of another African American employee.

80. Further, in and around this time, Plaintiff her immediate supervisors regarding disparate treatment of herself and other African American individuals.

81. For example, Plaintiff complained to [REDACTED] that she believed a qualified Black candidate was being passed over for an unqualified White applicant.

82. Further, on September 14, 2022, Plaintiff complained to [REDACTED], the Company's COO, stating that Plaintiff believed [REDACTED] treatment of Plaintiff was racially motivated.

83. Also, on January 31, 2023, Plaintiff emailed [REDACTED] that her treatment by

██████████, and others, was racially motivated.

84. Plaintiff further indicated that she was not being treated the same as her White co-workers with respect to salary, support and performance objectives/critiques.

85. The following day, on February 1, 2023, Plaintiff was terminated.

86. Defendant's conduct has caused Plaintiff pain, anguish, anxiety and distress.

87. The actions and conduct set forth herein were outrageous and showed an evil motive or reckless indifference or conscious disregard for the rights of Plaintiff, and therefore Plaintiff is entitled to punitive damages from Defendant, to punish Defendant and to deter Defendant and others from like conduct.

WHEREFORE, Plaintiff prays for judgment against Defendant on Count III of her Petition, for a finding that she has been subjected to unlawful conduct prohibited by V.A.M.S. § 213.010 *et seq*; for an award of compensatory and punitive damages; for her costs expended; for her reasonable attorneys fees; and for other and further relief the Court deems just and proper.

JURY DEMAND.

Plaintiff hereby demands a jury trial on all issues so triable.

RESPECTFULLY SUBMITTED,

HOLMAN SCHIAVONE, LLC

By: /s/ M. Shaun Stallworth
M. Shaun Stallworth, Mo#60764

4600 Madison Avenue, Suite 810
Kansas City, Missouri 64112
TEL: (816) 283-8738
FAX: (816) 283-8739
sstallworth@hslawllc.com

ATTORNEY FOR PLAINTIFF

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form.		AGENCY <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER 28E-2023-01317 E-06/23-55271
Missouri Commission on Human Rights and EEOC			
NAME (Indicate Mr., Ms., Mrs.) Sheena Watkins		HOME TELEPHONE (Include Area Code) [REDACTED]	
STREET ADDRESS [REDACTED]		CITY, STATE AND ZIP CODE [REDACTED]	DATE OF BIRTH [REDACTED]
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)			
NAME Higher Ground Education Inc.	NUMBER OF EMPLOYEES, MEMBERS 500+	TELEPHONE (Include Area Code) 949-689-7854; 949-836-9401	
STREET ADDRESS 10 Orchard Lane	CITY, STATE AND ZIP CODE Lake Forest, California 92630	COUNTY Orange	
NAME Higher Ground Education Inc.	TELEPHONE NUMBER (Include Area Code) 949-689-7854; 949-836-9401		
STREET ADDRESS 406 N. Main St., Ste. B	CITY, STATE AND ZIP CODE Rolla, MO. 65401	COUNTY	
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))		DATE DISCRIMINATION TOOK PLACE EARLIEST (ADEA EPA) LATEST (ALL)	
<input checked="" type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> DISABILITY <input type="checkbox"/> Other		September 8, 2022 – February 2023 <input type="checkbox"/> CONTINUING ACTION	

PARTICULARS:

I am an African American female, and my nation of origin is the United States. I was an employee at Higher Ground Education Inc. (the "Company"). I was initially hired by the Company on October 12, 2021, Regional Director over the Northeast Region. My region included 21 schools: New York (4), New Jersey (9), Maryland (5), Massachusetts (2), and Pennsylvania (1).

On or around July 15, 2022, I was assigned Museum Mile, a failing school that was losing the Company approximately 100k per month. I was instructed to hire a new leader for the school. [REDACTED] my supervisor, forced me to interview an unqualified White man [REDACTED] to lead the school despite having a more qualified Black female candidate ([REDACTED]). [REDACTED] was a 24-year-old who dropped out of college in his sophomore year. He had no experience in education and school leadership role would be his first job out of college. [REDACTED] was in her late 40s with a Master's degree in Education, two Montessori certifications, and over 20 years of experience in education. I complained to [REDACTED] that I believed a qualified Black candidate was being passed over for an unqualified White applicant. Ultimately, [REDACTED] believed Andrew was "scrappy." Consequently, [REDACTED] was hired as Head of School, at 110k with an 80k bonus potential, and [REDACTED] was hired as Assistant Head of School at 90k with a 15k bonus potential.

On or around September 8, 2022, I was up for a promotion that my previous manager, [REDACTED] put in place. [REDACTED] my Supervisor and VP of School Success, said she could not promote me to Senior RD because my performance reviews for the region were not completed on time. Notably, other regional directors did not have their performance reviews completed on time. However, they were not penalized. Importantly, [REDACTED] had not completed her performance reviews for us. Several days later, on September 13, 2022, [REDACTED] blamed me for the poor performance of Museum Mile, among other things, in spite of the fact that an unqualified White man, [REDACTED] was director of the school.

EXHIBIT**A**

On September 14, 2022, I complained to [REDACTED] the Company's COO, stating that I believed [REDACTED] treatment of me was racially motivated. [REDACTED] indicated she would look into my complaints. I never received any response. Following my complaints, On September 16, 2022, [REDACTED] and [REDACTED] were each promoted to Senior Regional Director.

On November 2, 2022, I met with [REDACTED] (Director of Special Projects reporting to [REDACTED] to discuss race dynamics, salary, and the disparate treatment I received from [REDACTED]. She advised me to study the Company's method to written communication and shift my approach accordingly for 60 days. If I saw a positive shift in communication from [REDACTED] and other members of senior leadership, then my communication style is the cause. However, if I saw no change or a negative shift, then I would have my answer. In response, I reached out to [REDACTED] manager of School Success, and asked her to coach me and pre-read my emails- which she did. Despite my efforts, the harassment got worse. For example, throughout the remainder of 2022, I was not allowed to staff my campuses, despite very clear evidence that the campuses were understaffed. My emails went ignored. My requests were denied. I was intentionally left off emails so I could not respond. This did not happen at campuses where the regional manager/director was White. My region's "hiring freeze" did not end until I sent an email to alert the company and tagged every senior leader from every department.

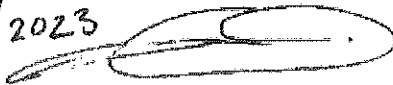
On January 19, 2023, I applied to take Montessori professional development courses through the Company's Prepared Montessorian Institute and was denied by [REDACTED] without a reason. [REDACTED] approved [REDACTED] a White woman, to take the courses.

On January 26, 2023, I met with [REDACTED] for our regularly scheduled 1:1 meeting. She informed me that layoff would occur in every department. However, later that day, I received notice that we hired a new regional manager to take over a smaller region. I sent [REDACTED] a Teams chat asking about the contradiction and received the following response: "I know it appears counterintuitive, however the restructuring is focused on creating localized regional teams to support expansion into more (smaller) regions than we have now."

On January 31, 2023, I emailed [REDACTED] that my treatment by [REDACTED] and others, was racially motivated. I further indicated that I was not being treated the same as my White co-workers with respect to salary, support and performance objectives/critiques.

The following day, on February 1, 2023, I was terminated. Notably, the Company posted an opening for a Regional Manager in Kansas City, MO. [REDACTED] a White woman who was also laid off from a different department, was offered the job. She resides in Minnesota.

I believe I have been discriminated against based on my race and sex, then retaliated against—all in violation of the Missouri Human Rights Act and any applicable federal law.

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY - (When necessary for State and Local Requirements)</p>
<p>I declare under penalty of perjury that the foregoing is true and correct.</p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p>
<p>6/8/2023 </p> <p>Date Charging Party (Signature)</p>	<p>SIGNATURE OF COMPLAINANT</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)</p>

FILED

JUN 19 2023

"MCHR"



MICHAEL L. PARSON
GOVERNOR

MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS
MISSOURI COMMISSION ON HUMAN RIGHTS

2416-CV18917

ANNA S. HUI
DEPARTMENT DIRECTOR

AL LI
COMMISSION CHAIR

ALISA WARREN, Ph.D.
EXECUTIVE DIRECTOR

Sheena Watkins



NOTICE OF RIGHT TO SUE

RE: Sheena Watkins vs. Higher Ground Education Inc.
E-06/23-55271 28E-2023-01317

The Missouri Commission on Human Rights (MCHR) is terminating its proceedings and issuing this notice of your right to sue under the Missouri Human Rights Act because you have requested a notice of your right to sue.

This letter indicates your right to bring a civil action within 90 days of the date of this notice against the respondent(s) named in the complaint. Such an action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred, but it must be brought no later than two years after the alleged cause occurred or its reasonable discovery. Upon issuance of this notice, the MCHR is terminating all proceedings relating to the complaint. No person may file or reinstate a complaint with the MCHR after the issuance of a notice of right to sue relating to the same practice or act. You are hereby notified of your right to sue the Respondent(s) named in your complaint in state circuit court. **THIS MUST BE DONE WITHIN 90 DAYS OF THE DATE OF THIS NOTICE OR YOUR RIGHT TO SUE IS LOST.**

You are also notified that the Executive Director is hereby administratively closing this case and terminating all MCHR proceedings relating to it. This notice of right to sue has no effect on the suit-filing period of any federal claims. This notice of right to sue is being issued as required by Section 213.111.1, RSMo, because it has been over 180 days after the filing of the complaint and MCHR has not completed its administrative processing.

Respectfully,

Alisa Warren, Ph.D.
Executive Director

April 23, 2024
Date

C: additional contacts listed on next page



JEFFERSON CITY OFFICE
421 E. DUNKLIN STREET
P.O. Box 1129
JEFFERSON CITY, MO 65102-1129
PHONE: 573-751-3325
FAX: 573-751-2905



ST. LOUIS OFFICE
111 N. 7TH STREET, SUITE 903
ST. LOUIS, MO 63101-2100
PHONE: 314-340-7590
FAX: 314-340-7238



KANSAS CITY OFFICE
P.O. Box 1129
JEFFERSON CITY, 65102-1129
FAX: 816-889-3582



SIKESTON OFFICE
106 ARTHUR STREET, SUITE D
SIKESTON, MO 63801-5454
FAX: 573-472-5321

Missouri Commission on Human Rights is an equal opportunity employer/program. Auxiliary aides and services are available upon request to individuals with disabilities.

TDD/TTY: 1-800-735-2966 (TDD) Relay Missouri: 711
www.labor.mo.gov/mohumanrights E-Mail: mchr@labor.mo.gov

**EXHIBIT
B**

RE: Sheena Watkins vs. Higher Ground Education Inc.
E-06/23-55271 28E-2023-01317

Higher Ground Education Inc.
10 Orchard Lane
Lake Forest, CA 92630

Rebecca Girn
Higher Ground Education
rkgirn@tohigherground.com

Shaun Stallworth
Holman Schiavone, LLC
4600 Madison Suite 810
Kansas City, MO 64112
ssallworth@hslawllc.com

Case 4:24-cv-00545-LMC Document 1-2 Filed 08/21/24 Page 17 of 26




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 2416-CV18917	(Date File Stamp)
Plaintiff/Petitioner: SHEENA WATKINS	Plaintiff's/Petitioner's Attorney/Address SHAUN STALLWORTH HOLMAN SCHIAVONE, LLC 4600 MADISON AVE STE 810 KANSAS CITY, MO 64112	
Defendant/Respondent: HIGHER GROUND EDUCATION INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050	
Nature of Suit: CC Other Tort		

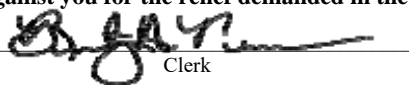
Summons in Civil Case

The State of Missouri to: HIGHER GROUND EDUCATION INC.
Alias:
 SRV RA: COGENCY GLOBAL INC
 406 N MAIN ST STE B
 ROLLA, MO 65401

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

10-JUL-2024
 Date


 Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

☐ delivering a copy of the summons and petition to the defendant/respondent.

☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with _____ a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

 Printed Name of Sheriff or Server

 Signature of Sheriff or Server

(Seal) **Must be sworn before a notary public if not served by an authorized officer:**
 Subscribed and sworn to before me on _____ (date).
 My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 2416-CV18917	(Date File Stamp)
Plaintiff/Petitioner: SHEENA WATKINS	Plaintiff's/Petitioner's Attorney/Address SHAUN STALLWORTH HOLMAN SCHIAVONE, LLC 4600 MADISON AVE STE 810 KANSAS CITY, MO 64112	
Defendant/Respondent: HIGHER GROUND EDUCATION INC.	Court Address: 308 W Kansas INDEPENDENCE, MO 64050	
Nature of Suit: CC Other Tort		

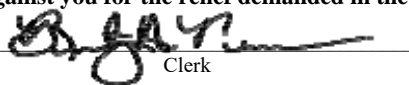
Summons in Civil Case

The State of Missouri to: HIGHER GROUND EDUCATION INC.
Alias:
 SRV RA: COGENCY GLOBAL INC
 406 N MAIN ST STE B
 ROLLA, MO 65401

COURT SEAL OF

JACKSON COUNTY

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10-JUL-2024
 Date


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Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

☐ delivering a copy of the summons and petition to the defendant/respondent.

☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with _____ a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

 Printed Name of Sheriff or Server

 Signature of Sheriff or Server

(Seal) **Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

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Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

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Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County



7/12
284
RETURN

IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: CORY LEE ATKINS	Case Number: 2416-CV18917
Plaintiff/Petitioner: SHEENA WATKINS	Plaintiff's/Petitioner's Attorney/Address SHAUN STALLWORTH HOLMAN SCHIAVONE, LLC 4600 MADISON AVE STE 810 KANSAS CITY, MO 64112
Defendant/Respondent: HIGHER GROUND EDUCATION INC.	vs. Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Other Tort	

RECEIVED

★ JUL 19 2024 ★

Phelps County
Sheriff Dept.

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: HIGHER GROUND EDUCATION INC.

Alias:

SRV RA: COGENCY GLOBAL INC
406 N MAIN ST STE B
ROLLA, MO 65401

COURT SEAL OF



JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

10-JUL-2024

Date

[Signature]
Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☒ delivering a copy of the summons and petition to the defendant/respondent.
☒ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with a person at least 18 years of age residing therein.
☐ (for service on a corporation) delivering a copy of the summons and petition to

_____ (name) _____ (title).

☐ other _____

Served at 406 N. Main St. Rolla, Mo. 65401 STE B (address)

in Phelps (County/City of St. Louis), MO, on 07/23/2024 (date) at 10:09 (time).

T. L. S. 284
Printed Name of Sheriff or Server

(Seal)

[Signature]
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$. _____ per mile)
Total \$ _____

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County



To Whom It May Concern:

Cogency Global Inc. acts as the registered agent for entities that have designated us to receive and forward Service of Process on their behalf. We do not have knowledge of the internal operations of the entities, nor do we have authority to sign any documents on behalf of the entities.

We appreciate your understanding in this matter.

Thank you,

Service of Process Team – sop@cogencyglobal.com

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

SHEENA WATKINS,

PLAINTIFF(S),

VS.

**CASE NO. 2416-CV18917
DIVISION 17**

HIGHER GROUND EDUCATION INC.,

DEFENDANT(S).

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE
AND ORDER FOR MEDIATION**

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **CORY LEE ATKINS** on **29-OCT-2024** in **DIVISION 17** at **09:00 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16th Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16th Judicial Circuit web site at www.16thcircuit.org after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

MEDIATION

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

POLICIES/PROCEDURES

Please refer to the Court's web page www.16thcircuit.org for division policies and procedural information listed by each judge.

/S/ CORY LEE ATKINS

CORY LEE ATKINS, Circuit Judge

Certificate of Service

This is to certify that a copy of the foregoing was electronic noticed, faxed, emailed and/or mailed or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

Attorney for Plaintiff(s):

SHAUN STALLWORTH, HOLMAN SCHIAVONE, LLC, 4600 MADISON AVE STE 810,
KANSAS CITY, MO 64112

Defendant(s):

HIGHER GROUND EDUCATION INC.

Dated: 10-JUL-2024

BEVERLY A. NEWMAN
Court Administrator